



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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LITIGATION BUREAU

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February 19, 2020

Via ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Ramnarine v. Bronx Psychiatric Center, et al., 16-cv-0479 (PGG)(GWG)

Dear Judge Gardephe:

This Office represents Defendant Edwina Bynum-Smith in the above-captioned employment discrimination action. I write to request a stay of the Court's Order dated February 18, 2021 (ECF No. 84) which sets forth the schedule for a summary judgment motion. Pursuant to the Order, Defendant's motion for summary judgment is due on March 17, 2021; Plaintiff's opposition is due on April 16, 2021; and Defendant's reply, if any, is due on April 26, 2021.

Plaintiff has obtained *pro bono* counsel for the limited purpose of defending her deposition and settlement negotiations. Plaintiff's counsel and I have been regularly meeting with the court-appointed mediator, Julie Kowitz Margolies. We are making progress in our discussions, and believe there may be a path to settlement. For this reason, we respectfully request additional time for further mediation to continue our settlement discussions. I have conferred with Plaintiff's counsel and she is in agreement and joins me in this request.

Thank you for your consideration.

Respectfully submitted,

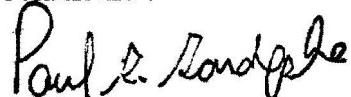
/s/ Carrie Windland
Assistant Attorney General

cc: Marie Ramnarine, Plaintiff *pro se* (by email)
Samantha James, *pro bono* counsel to Plaintiff (by email)

MEMO ENDORSED:

The summary judgment briefing schedule this Court issued on February 18, 2021 (Dkt. No. 84) is extended by thirty days. Any summary judgment motion by Defendant is due April 16, 2021; Plaintiff's opposition is due May 17, 2021; and any reply by Defendant is due May 27, 2021. The parties are directed to file an update on the status of mediation and settlement discussions by March 24, 2021.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dated: February 22, 2021